BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

COMPLAINT	ON POS	TE.C.S.	

Docket No. C99-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO FILE OBJECTIONS TO INTERROGATORIES AND TO RESPOND TO MOTION FOR A PROTECTIVE ORDER

The United States Postal Service hereby moves that it be granted an extension of one day to file objections to United Parcel Service interrogatories 1 – 24 and to respond to UPS's motion for a protective order, both filed on May 14, 1999. Additional time is requested due to the voluminous nature of the requests and the need for consultation both within and outside of the Postal Service, including with parties who have significant interests that are implicated by many of the interrogatories. Counsel for UPS has indicated that it has no objection to this motion.

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony F. Alverno

Attorney

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax -6187 May 24, 1999

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 May 24, 1999